

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**TERRY CARTER, JENNIFER
KRUEGER, AND LISBETT
RODRIGUEZ**

Plaintiffs,

V.

**TRANSIT TELEVISION
NETWORK LLC,**

Defendant.

Case No. 07 C 6608

Judge Leinenweber

Magistrate Judge Nolan

JURY TRIAL DEMANDED

AGREED MOTION TO RESET DISCOVERY CUT-OFF DATE

Plaintiffs, Terry Carter, Jennifer Krueger, and Lisbett Rodriguez, by and through their attorneys, Stowell & Friedman, Ltd., in support of their Motion to reset the discovery cut-off date in this matter, state as follows:

1. On February 5, 2008, the parties submitted a Rule 26(F) planning report, indicating that written discovery would conclude on May 15, 2008 with depositions concluding on June 16, 2008. Although the Court did not adopt the parties Rule 26(F) planning report, out of an abundance of caution, the parties move to reset the discovery deadlines.

2. During April 2008, counsel for Transit Television Network LLC started her maternity leave, which will end in late June 2008.

3. Similarly, counsel for Plaintiffs is expecting his first child in June 2008, and will be taking a two-week leave of absence.

4. Accordingly, the parties have delayed depositions and certain discovery to accommodate the attorneys' personal schedules. The parties have cooperated with each other in

setting depositions and discovery deadlines in this matter and continue to do so.

5. Currently, the parties have scheduled depositions into July 2008. Therefore, the parties respectfully request that the Court reset the discovery cut-off date for all discovery to conclude on or before August 15, 2008. Counsel for both parties join in this Motion.

Respectfully submitted,



Ethan G. Zelizer
One of the attorneys for
Plaintiffs



Karin Anderson
One of the attorneys for
Defendant